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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAR 10 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Redevelopment of Spectrum to)

Encourage Innovation in the Use of)

New Telecommunications Technologies)

ET Docket No. 92-9 ✓

RM-7981

RM-8004

SUPPLEMENTAL COMMENTS

GTE SERVICE CORPORATION

on behalf of its affiliated, domestic
telephone, satellite, and cellular companies.

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March 10, 1993

Their Attorney

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SUPPLEMENTAL COMMENTS

GTE Service Corporation, on behalf of its affiliated, domestic telephone, satellite and cellular companies ("GTE"), herein offers its Supplemental Comments in response to the above-referenced Further Notice of proposed Rulemaking ("FNPRM").¹ These Supplemental Comments address the 4 GHz rechannelization plan proposed by Alcatel Network Systems, Inc. ("ANS") in its Reply Comments to the FNPRM, as well as ANS's proposal to reallocate the 3.6-3.7 GHz band to accommodate displaced 2 GHz users.² GTE also responds to ANS's discussion of automatic transmitter power control ("ATPC") systems.

¹ Further Notice of Proposed Rulemaking, FCC 92-357 (Sept. 4, 1992).

² Since ANS significantly revised its initial proposal with its Reply Comments, GTE Spacenet Corporation pursuant to Section 1.415 of the Commission's rules, joined with other satellite operators in requesting an opportunity to respond to the Reply Comments of ANS. (See "Request for Leave to File Additional Comments," filed February 8, 1993.) To date the FCC has not acted on this request. To the extent required, therefore, GTE again requests permission in accordance with Section 1.415(d) to file these Supplemental Comments.

DISCUSSION

The Revised 4/6 GHz Channelization Plan Will Not Have Significant Adverse Impact on GTE's Satellite Operations.

With respect to the revised rechannelization plan proposed by ANS in its Reply Comments, GTE has reviewed the plan and believes that it can be accommodated in a manner which is not unduly disruptive for the primary types of services that GTE Spacenet provides in the 4/6 GHz ("C-Band"). GTE believes that the accommodation required for its particular C-Band services as a result of the revised ANS plan will not be significantly different from the negotiation and accommodation that currently take place with existing 4 GHz terrestrial microwave users in frequency coordination. GTE has never opposed new entry to the 4 GHz band so long as the frequency plan used does not adversely impact existing operations. The revised plan resolves the more significant barriers for sharing that existed in the earlier plan offered by ANS.

GTE Supports Efforts To Allow Displaced 2 GHz Users To Access Government Bands Where Possible.

In its initial Comments to this FNPRM, GTE urged the Commission to continue efforts to negotiate access to adjacent government bands (i.e., 1710-1850 MHz) for displaced 2 GHz users.³ As GTE pointed out, access to this band would benefit 2 GHz users in that minimal equipment and antenna structure facility changes would have to be made, compared to upper band (i.e., greater than 3 GHz) usage.

ANS has specifically recommended in its Reply Comments that the Commission initiate efforts to reallocate the 3.6-3.7 GHz band to accommodate 2 GHz users. GTE

³ See Comments of GTE Service Corporation, ET Docket No. 92-9, filed December 11, 1992,

supports this recommendation also, though it continues to support a review of the 1710-1850 MHz band for reasons cited in its earlier Comments. GTE believes that government bands should be reallocated to accommodate the 2 GHz users to the extent possible.

ATPC System Requirements For Satellite Services Are Different From Those Of Terrestrial Microwave Services.

In its Reply Comments, ANS cited the concerns of the satellite industry with respect to ATPC system requirements and summarily dismissed these specific concerns by concluding that FCC action "is neither appropriate nor needed."⁴ GTE does not oppose the use of ATPC systems, but contends that it is necessary for the Commission to impose certain boundaries on their operation. This is particularly important when they are used in frequency bands that are shared with satellite downlink services. Unlike terrestrial microwave links, satellite downlinks do not operate with large margins and, therefore, they cannot tolerate interference levels that exceed coordinated values by 10 dB, or possibly more, in the future.

GTE, therefore, submits that ATPC systems must be coordinated differently with satellite services than with terrestrial microwave services. GTE agrees with ANS that specific coordination criteria should be developed by entities such as the Telecommunications Industry Association ("TIA") and National Spectrum Managers Association ("NSMA"), but submits that satellite services will require different and more stringent coordination parameters than will terrestrial microwave services.

⁴ See Reply Comments of Alcatel Network Systems, Inc., Appendix B., p. 12.

GTE further recommends that the requirement to establish different coordination parameters be codified in FCC Rules (not the different parameters, but the requirement for different parameters). Codification is essential to ensure that appropriate safeguards will be employed to protect satellite downlinks from undue interference.

CONCLUSION

For the foregoing reasons, GTE does not oppose ANS's revised rechannelization plan, supports Commission initiatives to allow 2 GHz users to access government bands to the extent possible, and recommends that the requirement to establish different ATPC system parameters be codified in the Commission's rules.

Respectfully submitted,

GTE SERVICE CORPORATION

on behalf of its affiliated, domestic
telephone, satellite, and cellular companies.

By: 

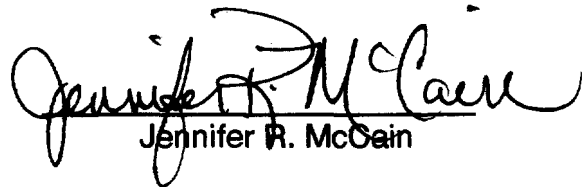
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March 10, 1993

Their Attorney

Certificate of Service

I, Jennifer R. McCain, hereby certify that copies of the foregoing "Supplemental Comments" of GTE Service Corporation have been mailed by first class United States mail, postage prepaid, on the 10th day of March, 1993 to all parties of record.


Jennifer R. McCain